



October 26, 2012

Mr. Nathan Dadap
United States Environmental Protection Agency Region IX
RCRA Facilities Management (WST-4)
75 Hawthorne Street
San Francisco, California 94105

**Re: Amendment #11 to the November 18, 2011 Application and Soil Management Plan
Temporary Stockpile on Planning Area 12B for Soil to be Consolidated, October 2012
Birch Hills Golf Course
2250 East Birch Street, Brea, California**

Dear Mr. Dadap:

On behalf of Chevron Land and Development Company (Chevron), URS Corporation (URS) is submitting Amendment #11 to the November 18, 2011 Application and Soil Management Plan (SMP) for the polychlorinated biphenyls (PCBs) detected on the Birch Hills Golf Course located in Brea, California (Site – Figures 1 and 2). This amendment is being submitted to Region IX of the United States Environmental Protection Agency (EPA) in accordance with 40 Code of Federal Regulations (CFR) Part 761.61(c) and to the Orange County Health Care Agency, which provides oversight for remedial activities at the Golf Course.

Amendment #11 is a modification to Amendment #8, Section 3.4, “Soil Management During Excavation”, to allow for temporary stockpiling of soil from the southwestern portion of the golf course onto Planning Area 12B until the soil can be transferred to the northern consolidation area (expected to be available in the April/May 2013 timeframe). This modification would allow the planned excavations and confirmation sampling within the southwestern portions to be completed in 2012, so that closure requirements for this area can be discussed with the EPA in a timely manner. This letter provides updated procedures based on discussions with EPA since the SMP was submitted. This letter is being submitted to EPA and OCHCA for design review and approval.

3.4 Soil Management During Excavation – Temporary Stockpile Modification

A temporary stockpile of soil intended for consolidation in the northern consolidation area will be made on Planning Area 12B. Planning Area 12B is the appropriate stockpile location because the approved November 2011 Soil Management Plan already includes provisions for excavating and transferring the upper surface of this planning area to the northern consolidation area. Soil for the stockpile will be taken from the following locations in the southwest – B-8D, B-9D, B-14C south, C-11A, C-13 south, C-13B, C-15A, C-9C, D-10B, D-11D, E-11A, E-15A, GS-71, GS-71B, GS-145. Additional locations may be included depending on weather conditions (GS-60/61) and/or confirmation sampling results from the on-going hazardous and non-hazardous PCB soil excavations and related pre-development activities. Procedures for the stockpile will include:

- Excavations for the soil stockpile will occur in November and potentially December 2012 as long as weather conditions permit field work to continue.

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- Excavation and confirmation sampling procedures will follow the approved Amendment #8 procedures.
- The temporary stockpile will be located within and adjacent to the current staging area for off-site soil disposal within Planning Area 12B (Figure 1). The exact volume and dimensions of the stockpile will be adjusted depending on the final volume of consolidation soil that will need to be removed from the southwest. The stockpile base will be above the planned excavations for Planning Area 12B, so that the entire stockpile ends up being transferred to the consolidation area. The stockpile will include soil excavated to create the staging area.
- The stockpiled soil will be covered with plastic sheeting to provide protection from wind and stormwater. The stockpile will be sloped for worker safety and erosion control. The cover will be held in place with sand bags or similar devices to maintain the cover over the soil. The cover will be inspected weekly.
- Stormwater runoff control around the stockpile and for Planning Area 12B in general will be protected in accordance with the stormwater control plans required under the Environmental Impact Report for this project. The Best Management Practices (BMPs) in this plan include but are not limited to protecting the stormwater outlets with sand bags to prevent silt from entering the outlet; erosion control measures on the slopes to minimize runoff; and site inspections to ensure stormwater control measures remain in place and are effective.
- The final dimensions/location of the stockpile will be surveyed once the stockpile is complete.
- Once the northern consolidation area is constructed (expected to be available in April/May 2013), the stockpiled soil will be transferred to the consolidation area along with the already planned removals of the surrounding soil in Planning Area 12B.

If you have any questions/comments please feel free to contact Jim Martinez at (714) 319-2257 or Jerome Zimmerle at (714) 433-7738.

Sincerely,
URS Corporation



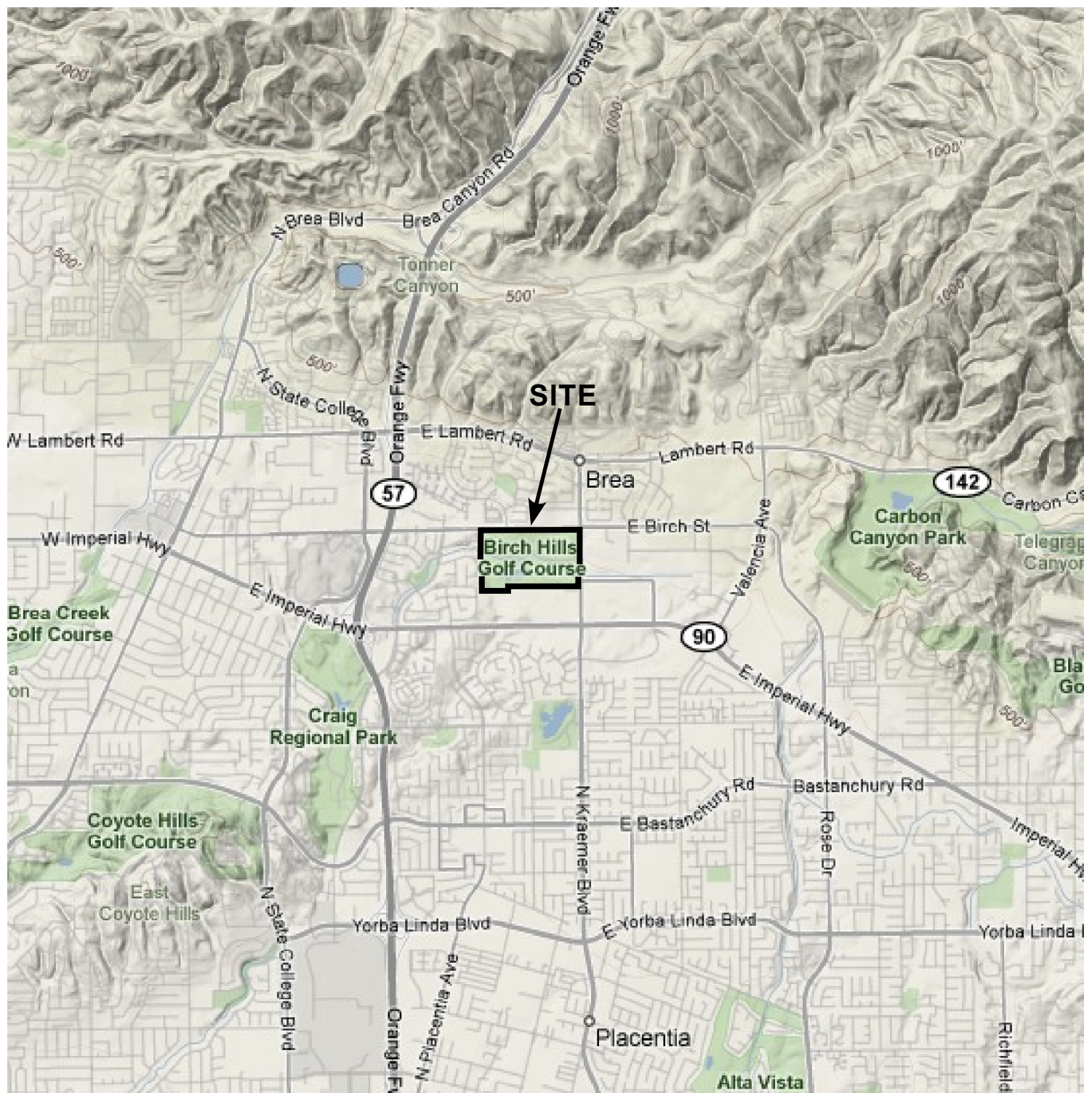
Jerome R. Zimmerle Jr., PE
Principal Engineer
California Professional Engineer No. C37453
October 26, 2012



cc: Jim Martinez (Chevron)
Trevor Black (Chevron)
Carmen Santos (EPA)

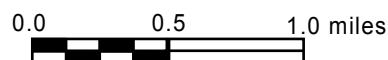
Garrick Jauregui (Chevron)
Steve Speer (OCHCA)
Thomas Rinehart (Chevron)

FIGURES



REFERENCE: Google Maps 2009

Approximate Scale



SITE VICINITY MAP

FIGURE 1

Birch Hills Golf Course
2250 East Birch Street
Brea, California

URS Job No: 29404241.10000

URS



